

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

GOOGLE LLC

Defendant.

CIVIL ACTION NO 7:24-CV-0033-DC-DTG

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

Defendant Google LLC respectfully moves this Court to extend the date by which to answer, plead or otherwise respond to Plaintiff's Complaint ("Complaint"). Defendant was served on February 2, 2024, making its response due Friday, February 23, 2024.

Defendant respectfully requests that the deadline to answer or otherwise respond to the Complaint be extended by sixty (60) days to April 23, 2024. Defendant has good cause to make this request because counsel for Google LLC needs additional time to adequately research the allegations and respond to the Complaint. Plaintiff is not opposed to the Motion.

Defendant does not seek delay in the case and submits this request so that justice may be done.

Date: February 12, 2024

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Katharine L. Carmona
Katharine Lee Carmona
Texas State Bar No. 00787399
kcarmona@jw.com
100 Congress Avenue, Suite 1100
Austin, Texas 78701
(512) 236-2000
(512) 236-2002 (facsimile)

Erica Benites Giese
Texas State Bar No. 24036212
egiese@jw.com
1900 Broadway, Suite 1200
San Antonio, Texas 78215
(210) 978-7700
(210) 978-7790 (facsimile)

Nathaniel St. Clair, II
Texas State Bar No. 24071564
nstclair@jw.com
2323 Ross Avenue, Suite 600
Dallas, Texas 75201
(214) 953-6000
(214) 953-5822 (facsimile)

CERTIFICATE OF CONFERENCE

I certify that, as recited, Jackson Walker L.L.P. counsel conferred by electronic mail with opposing counsel on February 6 and February 9, 2024 concerning this Motion, to which opposing counsel responded on February 9, 2024 that Plaintiff was not opposed to the request for additional time.

/s/ Katharine L. Carmona
Katharine Lee Carmona

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2024, a true and correct copy of the foregoing document was served electronically, via ECF, on all counsel of record who are deemed to have consented to such service under the Court's local rules.

/s/ Katharine L. Carmona
Katharine Lee Carmona